

3339 '99 SEP 17 AIO:02

Dockets Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Rm. 1061  
Rockville, MD 20852

Re: Docket numbers 98N-1230; 96P-0418; 97P-0197

Gentlemen\Ladies:

I am astounded that the forced molting of egg-laying hens continues unchallenged by the Food and Drug Administration. This practice of intentionally starving hens for periods up to 14 days is so stressful that it cripples their immune systems and turns them into factories for deadly bacteria.

Some 60 percent of U.S. egg producers put their hens into a forced molt by drastically reducing rations or by totally withdrawing food for up to two weeks.

According to the Food Animal Concerns Trust, this is done to bring about an additional round of egg laying more quickly than it would naturally occur, since the longer a bird goes without molting, the poorer the quality of egg produced.

But researchers are now seeing that flocks subjected to forced molts produce eggs with significantly higher levels of salmonella. According to USDA research immunologist Peter Holt, the practice depresses the cellular immune response and exacerbates the severity of any existing infection. In other words, the weakened condition of the starved hens makes them an easy target for the bacteria.

The USDA's Food Safety and Inspection Service (FSIS) stated: "FSIS recognizes that public health concerns are raised by highly stressful forced molting practices. For example, extended starvation and water deprivation practices lead to increased shedding of *Salmonella enteritidis* (Se) by laying hens subjected to these practices."

People who eat salmonella-tainted eggs develop flu-like symptoms of nausea, vomiting, diarrhoea, and in numerous cases, dehydration, convulsions and prostration. The Centers for Disease Control says it is among the top ten most deadly infectious diseases, yet it was virtually non-existent prior to the 1980.

The FDA's responsibility to public health demands that the agency take more aggressive action in this matter than merely placing warning labels on egg cartons and regulating the temperatures of egg refrigeration. I urge that swift action be taken to prohibit forced molting.

Sincerely yours,

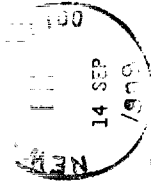
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98N 1230

HEALTH AND HUMAN SERVICES  
FOOD AND DRUG ADMINISTRATION  
**CROSS REFERENCE SHEET**

Docket Number/Item Code: 98N-1230/C615

See Docket Number/Item Code: 97P-0197/C616  
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